1 RENE L. VALLADARES Federal Public Defender 2 State Bar No. 11479 JOY CHEN 3 Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 4 Las Vegas, Nevada 89101 (702) 388-6577/Phone 5 (702) 388-6261/Fax Joy Chen@fd.org 6

Attorney for Giuseppe Russo

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

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GIUSEPPE RUSSO,

Defendant.

Case No. 2:17-cr-00243-JCM-NJK

STIPULATION TO CONTINUE REVOCATION HEARING (Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah, United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for Giuseppe Russo, that the Revocation Hearing currently scheduled on April 23, 2025, be vacated and continued to a date and time convenient to the Court, but no sooner than twenty-one (21) days.

This Stipulation is entered into for the following reasons:

1. Probation has informed defense counsel that an addendum containing new technical violations will be filed. Defense counsel has not yet received the addendum or the related discovery. Defense counsel requires additional time to discuss the new alleged

1 violations and evidence with the defendant. Defense counsel also requires additional time to 2 conduct independent investigation and to counsel the defendant on his legal options. 3 2. Neither probation nor the government oppose this continuance. 3. 4 Mr. Russo is out of custody and does not oppose the continuance. 5 4. The parties agree to the continuance. 6 This is the third request for a continuance of the revocation hearing. 7 DATED this 21st day of April, 2025. 8 RENE L. VALLADARES SIGAL CHATTAH 9 Federal Public Defender **United States Attorney** 10 11 By /s/ Joy Chen By /s/ Jessica Oliva 12 JESSICA OLIVA JOY CHEN Assistant Federal Public Defender Assistant United States Attorney 13 14 15 16 17 18 19 20 21 22 23 24 25

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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:17-cr-00243-JCM-NJK

Plaintiff,

ORDER

v.

GIUSEPPE RUSSO,

Defendant.

IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for Wednesday, April 23, 2025 at 10:30 a.m., be vacated and continued to **Wednesday, May 14, 2025,** at the hour of **11:00 a.m.**

DATED April 22, 2025.

UNITED STATES DISTRICT JUDGE

Cellus C. Mahan